

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

GINA M. ALONGI, as she is ADMINISTRATOR,
INTERNATIONAL UNION OF OPERATING
ENGINEERS LOCAL 4 HEALTH AND WELFARE,
PENSION, ANNUITY AND SAVINGS FUNDS,
LABOR-MANAGEMENT COOPERATION TRUST, and
HOISTING AND PORTABLE ENGINEERS LOCAL 4
APPRENTICE AND TRAINING FUND; and
INTERNATIONAL UNION OF OPERATING
ENGINEERS NATIONAL TRAINING FUND,
Plaintiffs,

vs.

SJ BLAIR EXCAVATION LLC,
Defendant.

C.A. No. 19-12953 IT

VERIFIED REQUEST TO ENTER DEFAULT

Plaintiffs Gina M. Alongi, as she is Administrator, International Union of Operating Engineers Local 4 Health and Welfare, Pension, Annuity and Savings Funds, *et al.* request the Clerk to enter the default of Defendant SJ Blair Excavation LLC (hereinafter “Blair”). This request is made pursuant to Rule 55(a), Fed.R.Civ.P. In support of this request, the Plaintiffs say:

- 1) The Complaint was filed on December 26, 2019.
- 2) The Complaint was served on Blair on January 9, 2020. See Docket No. 4.
- 3) Blair has never filed an Answer or a responsive pleading to the Complaint.

WHEREFORE, Plaintiffs seek the entry of Default in this matter.

Respectfully submitted,

GINA M. ALONGI, as she is ADMINISTRATOR,
INTERNATIONAL UNION OF OPERATING

ENGINEERS LOCAL 4 HEALTH AND
WELFARE, PENSION, ANNUITY AND
SAVINGS FUNDS, *et al.*,

By their attorney,

/s/Gregory A. Geiman

Gregory A. Geiman, Esq.

BBO #655207

I.U.O.E. Local 4 Trust Funds

16 Trotter Drive

Medway, MA 02053

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Dated: February 20, 2020

VERIFICATION

I, Gregory A. Geiman, verify that I have read this Verified Request to Enter Default and that the facts set out in the Request are true to the best of my knowledge and belief.

/s/Gregory A. Geiman

Gregory A. Geiman

CERTIFICATE OF SERVICE

This is to certify that a copy of the above Verified Request to Enter Default has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by first class mail, postage prepaid, to those indicated as non-registered NEF participants on this 20th day of February, 2020.

/s/ Gregory A. Geiman

Gregory A. Geiman, Esq.